

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TRACY NEIGHBORS AND BARBARA  
NEIGHBORS; ARUL MENEZES AND  
LUCRETIA VANDERWENDE; LAKE  
SAMMAMISH 4257 LLC; HERBERT  
MOORE AND ELYNNE MOORE; TED  
DAVIS AND ELAINE DAVIS; REID  
BROWN AND TERESA BROWN; SHAWN  
HUARTE AND TRINA HUARTE;  
ANNETTE MCNABB; EUGENE MOREL  
AND ELIZABETH MOREL; VOLKER  
ELSTE AND GAIL UREEL; JOHN R. WARD  
AND JOANNA WARD, AS CO-TRUSTEES  
OF THE WARD HALES LIVING TRUST;  
YORK HUTTON; L. LARS KNUDSEN AND  
LISE SHDO,

Plaintiffs,

v.

KING COUNTY, a municipal corporation and  
political subdivision of the State of  
Washington,

Defendant.

No. 2:15-cv-01358-MJP

**DECLARATION OF EMILY HARRIS**

I, Emily Harris, declare and state the following:

1. I am an attorney at Corr Cronin Michelson Baumgardner Fogg & Moore LLP and a  
Special Deputy Prosecuting Attorney for King County in the above-captioned matter. I am over

1 eighteen years of age, am competent to testify, and submit this declaration based upon personal  
2 knowledge in support of King County's Motion to Consolidate.

3 2. Attached as Exhibit A is a true and correct copy of the Complaint in *Hornish v. King*  
4 *County*, No. 2:15-cv-00284-MJP ("*Hornish*"), dated February 25, 2015.

5 3. Attached as Exhibit B is a true and correct copy of the Complaint in this action,  
6 *Neighbors v. King County*, No. 2:15-cv-013580 MJP ("*Neighbors II*"), dated August 20, 2015.

7 4. Attached as Exhibit C is a true and correct copy of discovery responses from *Hornish*,  
8 titled *Hornish Plaintiffs' Answers and Objections to Defendant King County's First Set of*  
9 *Interrogatories and Requests for Production*, dated September 22, 2015.

10 5. Attached as Exhibit D is a true and correct copy of discovery responses from *Hornish*,  
11 titled *Morel Plaintiffs' Answers and Objections to Defendant King County's First Set of*  
12 *Interrogatories and Requests for Production*, dated September 22, 2015.

13 6. Attached as Exhibit E is a true and correct copy of discovery responses from *Hornish*,  
14 titled *4257 LLC Plaintiffs' Answers and Objections to Defendant King County's First Set of*  
15 *Interrogatories and Requests for Production*, dated September 24, 2015.

16 7. Attached as Exhibit F is a true and correct copy of discovery responses from *Hornish*,  
17 titled *Menezes Plaintiffs' Answers and Objections to Defendant King County's First Set of*  
18 *Interrogatories and Requests for Production*, dated September 24, 2015.

19 8. Attached as Exhibit G is a true and correct copy of discovery responses from *Hornish*,  
20 titled *Moore Plaintiffs' Answers and Objections to Defendant King County's First Set of*  
21 *Interrogatories and Requests for Production*, dated September 28, 2015.

22 9. Attached as Exhibit H is a true and correct copy of discovery responses from *Hornish*,  
23 titled *Neighbors Plaintiffs' Answers and Objections to Defendant King County's First Set of*  
24 *Interrogatories and Requests for Production*, dated September 28, 2015.

10. Attached as Exhibit I is a true and correct copy of King County's Initial Disclosures from *Hornish*, dated September 24, 2015.

11. Attached as Exhibit J is a true and correct copy of Plaintiffs' Initial Disclosures from *Hornish*, dated September 23, 2015.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

DATED this 12<sup>th</sup> day of October, 2015 at Seattle, Washington.

/s/Emily J. Harris

Emily J. Harris

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